

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**No. 4:23-cr-422**

**JOE FRANK BARRERA  
RAYMOND WILLIAM BURNETT  
MORGAN SHANE COOPER  
WILLIAM ESPINOZA  
MARIO HUMBERTO GOMEZ  
JOSEPH ROY GOMEZ  
EDGAR MAURICIO HINOJOSA  
RUDLOPH CHRISTOPHER LOPEZ  
JESSE JAMES MULREIN  
RICARDO QUINONES  
JOE RIOS  
MOISES SORIANO**

**Defendants.**

**JOINT UNOPPOSED MOTION FOR CONTINUANCE**

Comes now, Judith Shields, attorney for Mario Humberto Gomez and moves this Court to continue the deadlines established in the Court's Amended Scheduling Order (Doc. #208) and set this matter for trial in December 2025; and in support thereof would respectfully show the court the following:

1. The current order has the following deadlines:

- a. May 1, 2025– Motions deadline
  - b. May 12, 2025- Pretrial Materials
  - c. May 16, 2025 – Pretrial conference
  - d. May 19, 2025– Jury selection and trial
2. Counsel has been informed by AUSA Byron Black that there is a large amount of discovery that is still being prepared for all defendants and there is the likelihood of a superseding indictment in this case.
3. Furthermore, Counsel will be out of state from May 12-23, 2025, for a college graduation that was scheduled before the new dates in the scheduling order.
4. For these reasons, Judith Shields moves that all dates be continued and the new trial date be set in December 2025. Counsel for the Government has informed counsel that trial in December would work best due to conflicts with other trial settings.
5. Counsel has received emails from all of the co-defendants and all join in the motion: Natalie Awad, counsel for Joe Frank Barrera; Edward Mallet, counsel for Raymond Burnet; Brett Podolsky, counsel for Morgan Cooper; Thomas Martin, counsel for William Espinoza; Albert Fong, counsel for Joseph Gomez; Lourdes Rodriguez, counsel for Edgar Hinojoa; Joel Bennett, counsel for Rudolph Lopez; Chikwudi Eguonu, counsel for Jesse Mulrein; Nicole

Deborde, counsel for Ricardo Quinones; Lance Hamm, counsel for Joe Rios; and Trent Gaither, counsel for Moises Soriano.

6. The law permits a continuance under these grounds under Title 18, United States Code, section 3161(h)(7)(A) and (B)(iv), as an “ends of justice” continuance, and all parties agree that this is a properly excludable delay.

Respectfully submitted,

/s/ Judith Shields

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### **CERTIFICATE OF CONFERENCE**

On April 24, 2025, I communicated via email with Assistant United States Attorney Byron Black about the contents of this motion. He does not oppose the granting of the motion.

/s/ Judith Shields

Judith Shields

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing motion was delivered to all counsel of record, on April 24, 2025, via ECF.

/s/ Judith Shields

Judith Shields